

MOTION FOR JUDICIAL NOTICE AND MOTION TO DISMISS FOR LACK OF JURISDICTION

IN THE BOONEVILLE DISTRICT COURT
LOGAN COUNTY, ARKANSAS

STATE OF ARKANSAS	)	
	)	
v.	)	CASE NOS: BDC-TR-2025-00321, 00322,
00323	)	
	)	
JONATHAN DANIEL CLEMENTS	)	

MOTION FOR JUDICIAL NOTICE AND MOTION TO DISMISS FOR LACK OF
JURISDICTION

Comes now the Defendant, Jonathan Daniel Clements, Living Trustee of ECC-TRUST-JDC-005, appearing specially and not generally, and respectfully moves this Court to take Judicial Notice of the documents previously submitted and to Dismiss this action for lack of subject matter and personal jurisdiction as it pertains to all traffic-related citations listed above.

1. Judicial Notice of Trust Record:

Defendant requests the Court take judicial notice of the ecclesiastical trust ECC-TRUST-JDC-005, lodged in a neighboring jurisdiction and publicly documented. Said trust holds legal standing under ecclesiastical authority, separate from civil or state jurisdiction. Under Arkansas Rules of Evidence 201, judicial notice is required for matters of public record and indisputable fact.

2. Jurisdictional Conflict:

The Booneville District Court lacks jurisdiction over ecclesiastical entities, living trustees operating in private capacity, and vehicles or property held in private trust and not engaged in state-regulated commerce. All citations issued under presumption of jurisdiction are null unless rebuttal of standing

and venue are proven on the record.

3. Lack of Legal Standing by Plaintiff:

The State has provided no verified claim of injury or jurisdictional authority over the ECC trust estate. Defendant is not operating in commerce, and therefore the vehicle in question does not fall under public regulation as presumed by the citations.

4. Due Process Violations:

Defendant has faced multiple citations issued on the same day, amounting to a pattern of harassment and attempted criminal escalation. Furthermore, Defendant's legal filings have not been acknowledged or rebutted, and access to court information has been improperly restricted.

WHEREFORE, the Defendant respectfully moves this Court to:

- Take Judicial Notice of ECC-TRUST-JDC-005 and ecclesiastical filings on record,
- Dismiss all citations and charges in this matter for lack of jurisdiction,
- Prohibit further enforcement against ecclesiastical trust property under color of law,
- Issue a certified dismissal order for all three citation cases listed herein.

Respectfully submitted,

Jonathan Daniel Clements
Living Trustee of ECC-TRUST-JDC-005
Date: October 21, 2025